

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Lifeline and Link Up Reform and	)	WC Docket No. 11-42
Modernization	)	
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Lifeline and Link Up	)	WC Docket No. 03-109
	)	
Advancing Broadband Availability through	)	WC Docket No. 12-23
Digital Literacy Training	)	

**COMMENTS OF ZERODIVIDE**

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## **Introduction**

ZeroDivide, a nonprofit organization focused on addressing the digital divide, respectfully submits these reply comments in response to the February 6, 2012 Further Notice of Proposed Rulemaking (FNPRM) in support of the critical role that digital literacy programs play in increasing broadband adoption within underserved communities.

Through ZeroDivide's 14-year experience in managing technology access and adoption grant programs, we have demonstrated that digital literacy training is an important component of broadband adoption. To achieve the goal of increasing broadband adoption in low-income communities, funded entities should extend beyond schools and libraries to include anchor institutions that best meet the needs of the full range of Lifeline eligible non-adopters. Furthermore, existing digital literacy programs should not be excluded from digital literacy training support.

Selection criteria for digital literacy training funding should emphasize community ties, cultural competence, capacity, expertise, accessibility, and sustainability. Eligible telecommunications carriers should not be included among eligible entities for digital literacy program funds. Finally, the digital literacy program should be a separate program that could be housed within USF.

### **A. Digital Literacy Training is an Important Component of Broadband Access.**

On the matter of whether the directive to provide "access" should be understood to include the ability for consumers to use broadband services once they have accessed them<sup>1</sup>, ZeroDivide agrees with comments filed by "Joint Consumers" (Access Humboldt, Advocates for Basic Legal Equality, The Benton Foundation, et. al.) that digital literacy is an important component of broadband access.<sup>2</sup> Furthermore, ZeroDivide's 14 years of experience in technology adoption programs has demonstrated that funding digital literacy training is an effective way to help close the digital literacy gap.<sup>3</sup>

Since ZeroDivide's inception in 1998, we have been singularly focused on increasing technology adoption and bridging the digital divide to improve economic opportunity, civic engagement, and community health among low-income, minority, and other underserved populations. Digital literacy training and education programs have been key components of our strategy for increasing technology adoption within underserved communities.

For example, ZeroDivide's two initiatives with the Broadband Technology Opportunities Program (BTOP) have demonstrated the effectiveness of technology training programs for increasing broadband adoption. Our Tribal Digital Village BTOP initiative with the Southern California Tribal Chairmen's Association has provided 8,200 digital literacy training hours to

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<sup>1</sup> FCC Order and FNPRM at para 423.

<sup>2</sup> "Joint Consumers," Comments before the Federal Communications Commission in the Matter of Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42, April 2, 2012, p. 5.

<sup>3</sup> FCC Order and FNPRM at para 427.

17,500 predominantly Native American participants in rural San Diego, California resulting in 189 new household subscribers with 37 new subscribers on a waiting list, and seven new business anchor subscriptions. Our Generation ZD Digital Literacy BTOP program, operated through seven community anchor institutions, has provided 422,000 training hours to 5,100 at-risk minority, low-income, and immigrant youth in California, Hawaii, New Mexico, Oregon, Utah, and Washington.

These programs include technology training programs that provide open lab access and are engaging, supportive, and culturally relevant. Curricula include multimedia training, Office and other office productivity software training, ESL/GED education, college preparatory training, basic Internet and computer use education, and Certified Technology Training activities.

In addition, a study of ZeroDivide's community wireless broadband projects in various underserved communities in California found that digital literacy training, availability of computer equipment, and community outreach and education were critical to the success of each project. In addition, the study revealed that broadband access alone would not have been great enough of an incentive for adoption.<sup>4</sup>

**B. Funded entities should extend beyond schools and libraries to include anchor institutions that best meet the needs of the full range of Lifeline eligible non-adopters.**

The Commission asks "Are there anchor institutions better suited to serve low-income non-adopters than schools and libraries, or perhaps in addition to schools and libraries?"<sup>5</sup> ZeroDivide agrees with comments by "Joint Consumers" that digital literacy programs should be designed to meet the needs of the full range of Lifeline eligible households,<sup>6</sup> thus requiring that other community anchor institutions, such as community-based organizations, community media centers, housing and social service agencies, after school programs, senior centers, and other community-based organizations, are included in funded entities.

A study by the Center for Justice, Tolerance, and Community at the University of California, Santa Cruz and ZeroDivide analyzed technology adoption among immigrant households. It found that technology training through community anchor institutions is most effective when it incorporates the following four dimensions: 1) Technology is used as a means for self-expression, 2) Training is provided in a safe, supportive, and culturally comfortable place, 3) Trainers provide support and mentoring for learning and academic achievement, and 4) Leadership training and opportunities for civic engagement are included in

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<sup>4</sup> Lee, Tina, ZeroDivide Case Study: Community Wi-Fi Study, May 2009

<sup>5</sup> FCC Order and FNPRM at para 428.

<sup>6</sup> "Joint Consumers," p. 6.

the curriculum.<sup>7</sup>

Community anchor institutions, such as nonprofit organizations, often provide the most effective means of delivering technology adoption training in underserved communities, and should be eligible, along with schools and libraries, to participate in the program. Afterschool and workforce development programs, community centers, and other community-based organizations often have existing supportive, culturally relevant service delivery models that target specific populations. Therefore, they are in many cases the best community partners to deliver technology training services. In many cases, it would be difficult, if not impossible, to replicate these existing community connections through schools and libraries that serve a broader population base.

### **C. Existing Digital Literacy Programs Should not be Excluded from Digital Literacy Training Support.**

ZeroDivide understands the Commission's desire that USF not displace existing public or private sector funding sources for digital literacy training services<sup>8</sup>, however, we agree with comments filed by New America Foundation's Open Technology Initiative and Access Humboldt that the Commission should not exclude existing digital literacy programs from USF digital literacy training support.<sup>9</sup>

As stated previously, community-based anchor institutions, many of which already receive funding through the Broadband Technology Opportunities Program or other public or private funding sources, are often the most effective conduits for reaching deep into underserved communities. Limiting USF funding to only those entities that are not currently receiving any existing funds for digital literacy training programs would exclude the very organizations that are best suited to deliver digital training, because they have proven track records in providing these training programs, have the capacity to deliver these services, and have experience operating within non-adopting communities.

For example, Self Help for the Elderly<sup>10</sup> is a multi-service agency providing critical digital training for monolingual Chinese American seniors in Northern California. They anticipate that the volume of their training will need to increase over the next few years, particularly as a result of health care reform, as seniors will need to sign up for health care exchanges online and interact with their health care providers via online portals to access electronic health records.<sup>11</sup> Self

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<sup>7</sup> Fairlie, Robert W., et al, "Crossing the Divide: Immigrant Youth and Digital Disparity in California." Center for Justice, Tolerance, and Community, University of California, Santa Cruz, September, 2006, pp. 33-34.

<sup>8</sup> FCC Order and FNPRM para 430.

<sup>9</sup> Morris, Sarah J. and Lennet, Benjamin, "Comments of the New America Foundation's Open Technology Initiative and Access Humboldt Before the Federal Communications Commission," In the Matter of Lifeline Link Up Reform and Modernization, April 2, 2012, p.7.

<sup>10</sup> [http://www.selfhelpelderly.org/services/computer\\_learning/centers.php](http://www.selfhelpelderly.org/services/computer_learning/centers.php)

<sup>11</sup> Interview with Self Help for the Elderly Executive Director April 10, 2012

Help for the Elderly is an excellent example of the kind of organization that could successfully implement the FCC's proposed digital literacy program. However, they would likely not be eligible under the construct suggested in the FNPRM.<sup>12</sup>

Furthermore, limiting eligible organizations to only those entities not currently funded to provide technology training would incur additional expenses for program participants. Entities that have no prior experience in delivering this type of training would incur startup costs beyond those outlined by the Commission (\$15,000 per year for approximately eight to ten hours of digital literacy training).<sup>13</sup> Additional startup costs would include technology costs, software costs, costs associated with recruiting and hiring instructors, costs for outreach materials, translation costs, and other potentially unforeseen costs. These additional cost requirements would likely have the unintended consequence of creating an additional barrier for organizations that seek to provide digital training services in low-income communities, and therefore preclude the very communities that this fund seeks to reach.

ZeroDivide agrees with comments by New America Foundation and Access Humboldt that the Commission could structure its program to increase the impact and reach of existing programs while concurrently leveraging the experience of those programs to develop new initiatives.<sup>14</sup> Thus, rather than viewing communities in which digital literacy programs are currently present as "already served," the Commission could instead treat these organizations as potential leaders in this area who are already equipped with valuable training and adoption experience that may, in many instances, benefit from additional funding to reach deep into communities that have yet to adopt broadband.

#### **D. Selection Criteria for Digital Literacy Funding Should Emphasize Community Ties, Capacity & Expertise, Cultural Competence, Accessibility, and Sustainability.**

The Commission asks about additional selection criteria, particularly should the demand exceed available funding for the digital literacy program.<sup>15</sup> In our experience funding digital literacy programs, there are five essential criteria for successful programs:

1. Programs must demonstrate strong ties to the community or population they seek to serve and have the strong indigenous support within/by members of the targeted communities.<sup>16</sup> Barriers to technology adoption vary among underserved communities.<sup>17</sup> Therefore, it is essential that organizations implementing digital literacy programs have intimate knowledge of these barriers in order to design and implement programs that address specific issues for specific communities.
2. Programs must demonstrate capacity and expertise to implement digital literacy training

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<sup>12</sup> FCC Order and FNPRM at para 430.

<sup>13</sup> FCC Order and FNPRM para 439.

<sup>14</sup> Morris, Sarah J. and Lennet, Benjamin, p 8.

<sup>15</sup> FCC Order and FNPRM a para 430 and 431.

<sup>16</sup> ZeroDivide, "Moving Communities onto the Broadband Technology Network to the NTIA on the Broadband Technology Opportunities Program," April 13, 2009, page 5.

<sup>17</sup> ZeroDivide, "National Broadband Plan for our Future: Comments to the FCC", June 8, 2009, p. 3

including qualified instructors (including bi-lingual instructors if necessary), appropriate technology, and capacity to collect and evaluate outcome data. They should have a proven track record of success in implementing digital literacy programs in the specific target community or population. New programs should be able to demonstrate success in related programs and clearly articulate their plan and curriculum for a new digital literacy program.

3. Programs must be culturally competent for the target population and include elements of culturally relevant content in the program design and training. This should include training in languages other than English for ESL and non-English speaking populations.
4. Programs should also be accessible to individuals with disabilities. 54% percent of adults living with a disability use the internet, compared with 81% of adults who report no disability.<sup>18</sup> While the digital literacy program should fund some entities with specific expertise in providing digital literacy training to individuals, all digital literacy programs funded under this proposed program should have the capacity to serve individuals with disabilities.
5. Programs must be sustainable to support continued digital literacy efforts over the long-term in underserved communities. We agree with comments filed by the “Joint Consumers” that digital literacy funds be targeted to community entities that demonstrate sustainability.<sup>19</sup>

#### **E. Eligible Telecommunications Carriers Should Not Be Included Among Eligible Entities for Digital Literacy Program Funds.**

ZeroDivide agrees with the comments of New America Foundation’s Open Technology Initiative and Access Humboldt that Eligible Telecommunications Carriers (ETCs) should not be funded to perform digital literacy training.<sup>20</sup> ETCs’ primary business is providing communications products and services and not training underserved communities in digital literacy. There are many other entities who are more suited to provide digital literacy training such as community-based organizations, community media centers, housing and social service agencies, afterschool programs and libraries. In ZeroDivide’s 14 years of experience supporting such organizations to implement digital literacy and technology adoption programs, we have found that it is essential that organizations have expertise working in underserved communities, understand cultural and language barriers to adoption, and are trusted sources of services in these communities.

ETCs are valuable partners in the effort to increase digital literacy and can play a valuable role in partnering with community anchor institutions to support digital literacy in underserved communities by:

- Providing free and low cost access to internet for community-based organization providing training;
- Providing or subsidizing equipment for training; and
- Supporting publicity and outreach efforts for Digital Literacy Training programs; and

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<sup>18</sup> Fox, Susannah, “Americans living with disability and their technology profile.” Pew Research Center’s Internet & American Life Project, January 21, 2011 p. 3.

<sup>19</sup> “Joint Consumers,” p. 6

<sup>20</sup> Morris, Sarah J. and Lennet, Benjamin, p.4.

- Providing matching grant dollars for programs supported by an FCC Digital Literacy Training program.

#### **F. The Digital Literacy Program Should be a Separate Program That Could be Housed Within USF.**

ZeroDivide agrees with the comments of “Joint Consumers” that the Digital Literacy program funded with Universal Service Funds would require the creation of a separate program to allow for non-ETC, community-based organizations, and other community anchor institutions to receive funds from the USF.<sup>21</sup>

Funding digital literacy programs is quite different in nature than providing discounts for Internet connection, hardware and software, as in the E-rate program. Over the last 14 years, ZeroDivide has funded over 500 technology adoption programs, most of which were digital literacy programs. Selecting and managing these grants are not simple transactions, but involve developing clear criteria for selection, extensive due diligence, ongoing management and oversight, technical assistance, and outcomes measurement. This involves developing and employing systems and procedures to examine and evaluate the following characteristics of a potential grantee:

- Organizational capacity (overall and to perform digital literacy)
- Technology expertise
- Cultural competence
- Curriculum
- Project Plan
- Outreach
- Outcomes measurement and data collection

In ZeroDivide’s experience, it is essential that staff administering a digital literacy funding program understand the various barriers to technology adoption in underserved communities and reflect and understand the communities the programs seek to serve.<sup>22</sup>

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<sup>21</sup> “Joint Consumers,” p. 7

<sup>22</sup> Bernholz, Lucy; Joh, Tina; Wang, Tony “Reset, Ready, Start! Lessons from ZeroDivide’s Community Investment Model,” Page 12.